

ESTTA Tracking number: **ESTTA382186**

Filing date: **12/06/2010**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91196580
Party	Plaintiff LinkedIn Corporation
Correspondence Address	JANET L CULLUM COOLEY LLP 1114 AVENUE OF THE AMERICAS NEW YORK, NY 10036-7798 UNITED STATES trademarks@cooley.com, jcullum@cooley.com, negnatios@cooley.com, aanderson@cooley.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Noel K. Egnatios
Filer's e-mail	negnatios@cooley.com, jcullum@cooley.com, aanderson@cooley.com, trademarks@cooley.com
Signature	/Noel K. Egnatios/
Date	12/06/2010
Attachments	LinkedIn v Torridred Joint Motion to Suspend.pdf (4 pages)(102549 bytes)

Certificate of Transmission	
I hereby certify that this correspondence is being electronically filed via ESTTA.	
	(Name)
	(Date)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of application Serial No. 77/883,243
For the Trademark LINKEDNETS LINKING NETWORKS.
LINKING PEOPLE.
Published in the Official Gazette
on May 25, 2010

LINKEDIN CORPORATION,)	
)	
Opposer,)	
)	Opposition No. 91196580
v.)	
)	
TORRIDRED INCORPORATED,)	
)	
Applicant.)	
_____)	

STIPULATED MOTION FOR SUSPENSION OF OPPOSITION

Pursuant to 37 C.F.R. § 2.117(c) and TBMP § 510.03(a), Opposer LinkedIn Corporation (“LinkedIn”) and Applicant Torridred, Inc. (“Torridred”), hereby stipulate and respectfully move to suspend this opposition proceeding for ninety (90) days for the purpose of settlement

negotiations, subject to the right of either party to request resumption at any time by filing a written notice with the Board.

The parties request that the Board suspend discovery for ninety (90) days and further request that the following discovery and trial deadlines in the Board's September 22, 2010 order be extended by ninety (90) days as delineated below:

Initial Disclosures Due	4/01/2011
Expert Disclosures Due	7/30/2011
Discovery Closes	8/30/2011
Plaintiff's Pretrial Disclosures	10/14/2011
Plaintiff's 30-day Trial Period Ends	11/28/2011
Defendant's Pretrial Disclosures	12/12/2011
Defendant's 30-day Trial Period Ends	1/27/2012
Plaintiff's Rebuttal Disclosures	2/11/2012
Plaintiff's 15-day Rebuttal Period Ends	3/11/2012

The Parties believe good cause for the suspension of discovery and extension of the discovery and trial deadlines according to the terms listed above exists because it will allow the Parties to focus on their ongoing settlement negotiations and continue their good faith efforts to settle this opposition proceeding in its entirety, thereby preserving judicial and party resources. The Parties have met to discuss settlement and LinkedIn has provided an initial settlement proposal, which Torridred is presently reviewing. The Parties also held their mandatory F.R.C.P. 26(f) discovery conference on December 1, 2010 via telephone and as part of that conference discussed further the potential for settlement. The Parties agree that the conducting of discovery at the present time would not aid in their ongoing settlement discussions.

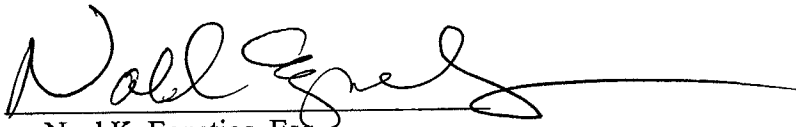
The Parties therefore respectfully request that the Board grant this stipulated motion to suspend the opposition proceeding for a period of ninety (90) days in order to allow the Parties time to continue their settlement negotiations.

Respectfully submitted,

Attorneys for Opposer:

COOLEY LLP


Date: December 4, 2010

By: 
Noel K. Egnatios, Esq.
4401 Eastgate Mall
San Diego, CA 92121-1909

Attorneys for Applicant:

HOWISON & ARNOTT LLP

Date: December 4, 2010

By: 
John J. Arnott, Esq.
5420 LBJ Freeway, Suite 660
Dallas, TX 75240-2318

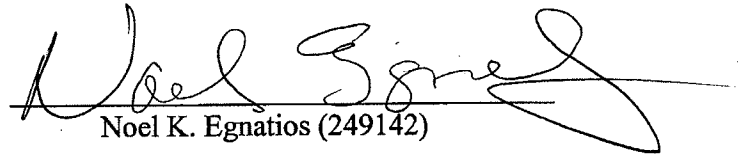
Motion for Suspension
Serial No. 77/883,243
Opposition No. 91196580

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Stipulated Motion for Suspension of Opposition was mailed, first-class postage prepaid, to counsel for Applicant:

John J. Arnott, Esq.
Howison & Arnott LLP
5420 LBJ Freeway, Suite 660
Dallas, TX 75240-2318

Date: December 6, 2010


Noel K. Egnatios (249142)